

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

In re:

QR Properties, LLC

Debtor

Chapter 11

Case No. 10-45514-MSH

**CHAPTER 11 DEBTOR IN POSSESSION'S OBJECTIONS TO CLAIMS 2 (GREGORY A. HULECKI) 3 (SUSAN AND STEPHEN MULLER), 4 (PAUL R. LEWIS) 5 (PAUL G. GIOVACCHINI) 6 (KIRK WARE) 7 AND 10 (RONALD G. THOMPSON) 8 (DAVID G. ST. AMAND) 11 (JOHN J. GRANAHAH) 12 (ROBERT F. GRANAHAH) 15 (SENA BISWAS AND NAOMI BISWAS) 16 (ROBERT O. BALL III) 17 (JOHN S. BOWMAN) 18 (DAVID SAPONARO) 20 (MICHAEL DUNHAM) 21 (JOHN BOGAN) 22 (ERIC SCHURR) 23 (PATRICK MORLEY) 24 (RON NORDIN) 25 (WILLIAM KLOPPENBURG) 26 (ALBERT SERPA) 27 (DEBORAH REED) 28 (GREGORY C. BADGER) 29 (MIKE FITZGERALD) 30 (JAMES HELLER) 31 (JAMES POMPOSELLI) 32 (STEVE LERNER) 33 (STEVE HELLER) 34 (JERRY EATON) 35 AND 36 (CHRIS MANNING) AND 37 (PETER MANNING, JR.)**

QR Properties, LLC (the "Debtor"), the debtor-in-possession in the above-captioned proceeding, hereby objects to the following claims. As grounds for its objections, the Debtor states the following:

1. On November 3, 2011 (the "Petition Date"), the Debtor filed a voluntary petition seeking relief under chapter 11 of title 11 of the United States Code (the "Code") in the United States Bankruptcy Court for the District of Massachusetts (the "Court").

2. The Debtor continues to operate as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Code.

3. The Debtor is a Massachusetts limited liability company and is the owner of land located in Acton, Middlesex County, Massachusetts, which is shown on a Plan of Land entitled "The Residences at Quail Ridge" located at 354B Great Road and Skyline Drive, Acton,

Massachusetts, together with all easements, rights of way, sewer rights, water rights and other rights appurtenant thereto or used in connection therewith (collectively the "Premises").

4. The Premises, which contain approximately 156 acres, currently contains an 18 hole golf course.

5. On March 14, 2011, the Court entered an order granting a motion by the Debtor and establishing June 10, 2011, as the last date by which claims could be filed.

**Claims Against Quail Ridge Country Club, LLC**

6. The Debtor hereby objects to the following claims:

7.

Claim No.	Claimant	Date Filed	Amount
2	Gregory A. Hulecki	4/6/11	\$50,000.00
3	Susan and Stephen Muller	4/13/11	\$50,000.00
4	Paul R. Lewis	4/13/11	\$75,000.00
5	Paul G. Giovacchini	4/20/2011	\$50,000.00
6	Kirk Ware	4/22/11	\$50,000.00
8	David G. St. Amand	5/6/11	\$50,000.00
10	Ronald G. Thompson	5/19/11	\$50,000.00
11	John J. Granahan	6/3/11	\$75,000.00
12	Robert F. Granahan	6/3/11	\$75,000.00
15	Sena Biswas and Naomi Biswas	6/3/11	\$90,000.00
16	Robert O. Ball III	6/6/11	\$50,000.00
17	John S. Bowman	6/8/11	\$90,000.00
18	David Saponaro	6/7/11	\$50,000.00
20	Michael Dunham	6/7/11	\$75,000.00
21	John Bogan	6/9/11	\$75,000.00
22	Eric Schurr	6/9/11	\$50,000.00
23	Patrick Morley	6/9/11	\$85,000.00
24	Ron Nordin	6/9/11	\$75,000.00
25	William Kloppenburg	6/9/11	\$50,000.00
26	Albert Serpa	6/10/11	\$75,000.00

27	Deborah Reed	6/10/11	\$75,000.00
28	Gregory C. Badger	6/10/11	\$65,000.00
29	Mike Fitzgerald	6/9/11	\$50,000.00
30	James Heller	6/9/11	\$65,000.00
31	James Pomposelli	6/9/11	\$50,000.00
32	Steve Lerner	6/9/11	\$65,000.00
33	Steve Heller	6/10/11	\$65,000.00
34	Jerry Eaton	6/9/11	\$50,000.00
36	Chris Manning	6/9/11	\$50,000.00
37	Peter Manning Sr. <sup>1</sup>	6/9/11	\$50,000.00

(collectively, the “Quail Ridge Country Club Claims”).”

8. Each of the Quail Ridge Country Club Claims is based upon subscription agreements between the claimant and Quail Ridge Country Club, LLC and membership deposits paid by the claimants to Quail Ridge Country Club, LLC.

9. Quail Ridge Country Club, LLC is a Massachusetts limited liability company and the former owner of the Premises.

10. The Debtor is not a party to any of the subscription agreements or any other agreements with the claimants.

11. The Debtor did not receive any membership deposits from any of the claimants or from Quail Ridge Country Club, LLC on behalf of any of the claimants.

12. The Debtor has no obligation to any of the claimants pursuant to any subscription agreements or otherwise.

13. The Debtor therefore requests that the Court sustain its objection and disallow each of the Quail Ridge Country Club claims.

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<sup>1</sup> The Court’s claims register states that claim no 37 was filed by Peter Manning Jr. but the claim indicates that it is filed by Peter Manning, Sr.

**DUPLICATE CLAIMS (NO. 7, RONALD G. THOMPSON, AND NO. 35, CHRIS MANNING)**

14. On May 3, 2011, Ronald G. Thompson filed a claim, no. 7 on the Court's claims register, in the amount of \$50,000.00. On May 19, 2011, Ronald G. Thompson filed a claim, no. 10 on the Court's claims register, also in the amount of \$50,000.00.

15. Although claim no. 10 does not indicate that it was intended to amend or supersede claim no. 7, claim no. 7 appears to be based upon the same subscription agreement, deposit and other circumstances as claim no. 10 and to be a duplicate of claim no. 10.

16. The Debtor objects to claim no. 7 as being a duplicate of claim no. 10 and requests that the Court sustain its objection and disallow claim no. 7.

17. On June 9, Chris Manning filed a claim, no. 35 on the Court's claims register, in the amount of \$50,000.00.<sup>2</sup> On June 9, 2011, Chris Manning filed a second claim, no. 36 on the Court's claims register, also in the amount of \$50,000.00.

18. Although claim no. 36 does not indicate that it was intended to amend or supersede claim no. 35, claim no. 36 appears to be based upon the same subscription agreement, deposit and other circumstances as claim no. 35 and to be a duplicate of claim no. 35.

19. The Debtor objects to claim no. 35 as being a duplicate of claim no. 36 and requests that the Court sustain its objection and disallow claim no. 35.

QR PROPERTIES, LLC  
By its attorneys,

/s/  
Joseph G. Butler (BBO # 544284)

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<sup>2</sup> The Claims Register indicates that claim no 35 was filed by Peter Manning, Jr. but claim no. 35 and the supporting documents to the claim both indicate that it was filed by Chris Manning.

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Dated: September , 2011

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

In re:

QR Properties, LLC

Debtor

Chapter 11

Case No. 10-45514-MSH

**CERTIFICATE OF SERVICE**

I, , of Barron & Stadfeld, P.C., do hereby certify that on , 2011, I served a copy of the Objection to Claims on the persons on the attached service list by causing a copy of same to be mailed by first class mail, postage prepaid or as otherwise indicated on the service list.

Signed under the penalties of perjury , 2011.

/s

\_\_\_\_\_

Service List  
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